

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

NORAMCO LLC,

Plaintiff,

v.

DISHMAN USA, INC.,

Defendant.

Civil Action No. 1:21-cv-01696-WCB

**PLAINTIFF’S EMERGENCY MOTION FOR CONTINUATION OF PROVISIONAL
REMEDY AGAINST ASSETS PURSUANT TO F.R.C.P. RULE 64**

Plaintiff Noramco LLC (“Plaintiff”), by and through its undersigned counsel, hereby files this emergency motion (the “Motion”), pursuant to Rule 64 of the Federal Rules of Civil Procedure, for entry of an order authorizing Plaintiff to continue its levy against assets of Defendant Dishman USA, Inc. during the pendency of this action until a Final Order.¹ Plaintiff further requests that the Court enter an interim order authorizing Plaintiff to continue its levy pending disposition of this Motion. In support of the Motion and the relief requested herein, Plaintiff incorporates the supporting brief and *Attorney Affirmation of Andrew J. Bayne* (“Bayne Aff.”) and exhibits thereto filed concurrently herewith.

Statement Pursuant to Local Rule 7.1.1

Counsel for the parties made a reasonable effort to reach agreement concerning this motion, including oral communication involving Delaware counsel on both sides, but were unable to reach agreement.

¹ For purposes hereof, a “Final Order” means an order or judgment of the District Court, or such other United States court of competent jurisdiction, as to which: (a) no appeal is pending, (b) the time to appeal has expired and (c) no further appeal has been timely taken.

Dated: July 30, 2024
Wilmington, Delaware

THE ROSNER LAW GROUP LLC

/s/ Zhao Liu

Frederick B. Rosner, Esq. (DE #3995)
Zhao Liu, Esq. (DE #6436)
824 Market Street, Suite 810
Wilmington, DE 19801
Telephone: 302-777-1111
rosner@teamrosner.com
liu@teamrosner.com

Respectfully submitted,

THE BAYNE LAW GROUP LLC

/s/Jennifer M. Mohamed

Jennifer M. Mohamed, Esq.
Andrew J. Bayne, Esq.
116 Village Boulevard, Suite 235
Princeton, New Jersey 08543-3036
Phone: (609) 924-4295
jennifer@baynelaw.com
abayne@baynelaw.com

Attorneys for Plaintiff, Noramco LLC